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6 GRAPH FOUNDATION, INC.

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION
10

11 NEO4J, INC., a Delaware corporation

12 Plaintiff,

13 vs.

14 GRAPH FOUNDATION, INC., an Ohio
15 corporation,

16 Defendant.
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Case No. 5:19-CV-06226-EJD

**GRAPH FOUNDATION, INC.'S
[PROPOSED] ORDER DENYING MOTION
TO COMPEL FURTHER RESPONSES TO
INTERROGATORIES**

1 Now before the Court is Plaintiff Neo4j, Inc.'s Motion to Compel Defendant Graph
2 Foundation Inc. to provide further responses in response to Neo4j's Special Interrogatories Set 1.

3 Having considered the Parties' Joint Statement with respect to this discovery dispute and
4 the materials filed therewith, and good cause appearing therefore:

5 IT IS HEREBY ORDERED that:

- 6 1. Neo4j's Motion to Compel Graph Foundation to provide a further response to
7 Interrogatory No. 2 is denied. Neo4j may seek a deposition of Graph Foundation under
8 FRCP 30(b)(6) with respect to this topic.
- 9 2. Neo4j's Motion to Compel Graph Foundation to provide a further response to
10 Interrogatory No. 5 is denied as Graph Foundation has responded to the interrogatory.
11 Neo4j may seek a deposition of Graph Foundation under FRCP 30(b)(6) with respect
12 to issues relating to the topic of this interrogatory.
- 13 3. Neo4j's Motion to Compel Graph Foundation to provide further responses to
14 Interrogatories Nos. 6, 7 and 11 is denied. Neo4j has failed to demonstrate that there is
15 a governmental interest sufficient to overcome the privacy interests of Graph
16 Foundation's donors. *Ctr. for Competitive Politics v. Harris*, 784 F.3d 1307, 1317 (9th
17 Cir. 2015).
- 18 4. Neo4j's Motion to Compel Graph Foundation to provide further responses to
19 Interrogatories Nos. 10, 11, 13, 16 and 20 is denied. Graph Foundation has sufficiently
20 responded to these interrogatories.
- 21 5. Neo4j's Motion to Compel Graph Foundation to provide further responses to
22 Interrogatories Nos. 17 and 18 is denied. Graph Foundation shall supplement its
23 responses to these interrogatories after discovery with respect to the issues relevant to
24 Graph Foundation's affirmative defenses is concluded.

SO ORDERED

Dated: _____, 2020

Judge Susan van Keulen
United States Magistrate Judge